

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF OKLAHOMA

FILED

APR 17 2018

CARMELITA REEDER SHINN, CLERK
U.S. DIST. COURT, WESTERN DIST. OKLA.
BY Emily M. Johnson, DEPUTY

UNITED STATES OF AMERICA,)

Plaintiff,)

-vs-)

JERRY DRAKE VARNELL,)

Defendant.)

No. CR-17-239-M

Violations: 18 U.S.C. § 844(i)
18 U.S.C. § 2332a

SUPERSEDING INDICTMENT

The Federal Grand Jury charges:

COUNT 1

(Attempted Use of an Explosive Device)

On or about August 11, 2017, to August 12, 2017, in the Western District of Oklahoma, the defendant,

----- **JERRY DRAKE VARNELL**, -----

maliciously attempted to damage and destroy, by means of fire and an explosive, a building and real property used in interstate and foreign commerce and in an activity affecting interstate and foreign commerce. In particular, the defendant attempted to use explosives to damage and destroy the BancFirst office building at 101 N. Broadway, Oklahoma City, Oklahoma.

All in violation of Title 18, United States Code, Section 844(i).

COUNT 2
(Attempted Use of a Weapon of Mass Destruction)

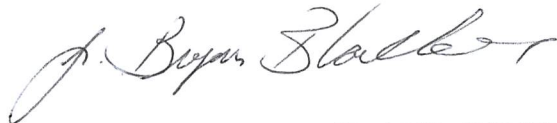
On or about August 11, 2017, to August 12, 2017, in the Western District of Oklahoma, the defendant,

----- **JERRY DRAKE VARNELL**, -----

without lawful authority, did knowingly attempt to use a weapon of mass destruction, namely, a destructive device as defined in Title 18, United States Code, Section 921, to wit, an explosive or incendiary bomb, against any person and property within the United States, specifically, the BancFirst office building at 101 N. Broadway, Oklahoma City, Oklahoma, and such property was used in interstate and foreign commerce and in an activity that affects interstate and foreign commerce, and the results of the offense would have affected interstate and foreign commerce.

All in violation of Title 18, United States Code, Section 2332a.

A TRUE BILL:



FOREPERSON OF THE GRAND JURY

ROBERT J. TROESTER
Acting United States Attorney



MATT DILLON
MARK R. STONEMAN
Assistant U.S. Attorneys